

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

CGBM 100, LLC and ACCUTRANS, INC.	§	
	§	
v.	§	Civil Action No. 3:15-cv-00026
	§	Diversity
	§	Jury Demand
FLOWERVE US INC.,	§	
FLOWERVE CORPORATION and	§	
STERLING SHIPYARD, LP	§	

**PRETRIAL DISCLOSURES OF DEFENDANTS
FLOWERVE CORPORATION AND FLOWERVE US INC.**

To the Honorable John R. Froeschner, United States Magistrate Judge:

Pursuant to Fed. R. Civ. P. 26(a)(3), Flowserve Corporation and Flowserve US Inc.
("Defendants") provide the following pretrial disclosures.

Witnesses

Paul Bowman
125 Concession 13
Hagersville, Ontario, Canada N0A 1H0
Tel: 905-379-6162

Defendants expect to call Mr. Bowman as a witness in this case. Mr. Bowman can be contacted through counsel for Defendants. Mr. Bowman may be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Robert Canon
5807 County Road 101
Sandia, Texas 78383
Tel: 610-704-2304

Defendants expect to call Mr. Canon as a witness in this case. Mr. Canon can be contacted through counsel for Defendants. Mr. Canon may be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Crissy Czerny
2740 Indiana Avenue
Kenner, Louisiana
Tel: 504-469-0500

Defendants expect that Ms. Czerny will be called live by Plaintiff CGBM 100, LLC. Defendants intend to cross examine Ms. Czerny. If the need arises, Defendants reserve the right to call Ms. Czerny as a witness by videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Daniel J. Duplantis
Greenwood Marine Management, Inc.
300 Everett Street
Morgan City, Louisiana 70381
Tel: 985-384-2168

Defendants expect to call Mr. Duplantis as a witness in this case. Mr. Duplantis can be contacted through counsel for Defendants. Mr. Duplantis may be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Clinton Evans
461 Poenisch
Corpus Christi, Texas 78412
Tel: 361-850-3317

In the event that Mr. Evans is called live by another party, Defendants will cross examine Mr. Evans at trial. Mr. Evans is not under the control of Defendants. If not called live by another party, Defendants expect to call Mr. Evans as a witness in this case by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Barry Geraci
3118 Harrisburg #100
Houston, Texas 77003
Tel: 281-532-2080

Defendants expect to call Mr. Geraci as a witness in this case. Mr. Geraci is not under the control of Defendants. Mr. Geraci will called live.

Tyler Harden
Flowserve Canada Corp.
3501 Galaznik Road
Angleton, Texas 77515
Tel: 979-235-9906

Defendants expect to call Mr. Harden as a witness in this case. Mr. Harden can be contacted through counsel for Defendants. Mr. Harden will be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Barry James Hart
Flowserve Corporation
401 Heron Drive
Bridgeport, New Jersey
Tel: 609-841-1712

Defendants expect to call Mr. Hart as a witness in this case. Mr. Hart can be contacted through counsel for Defendants. Mr. Hart will be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Matthew Kearns
3101 East Navigation
Corpus Christi, Texas 78403-2441
Tel: 361-887-7981

In the event that Mr. Kearns is called live by another party, Defendants will cross examine Mr. Kearns at trial. Mr. Kearns is not under the control of Defendants. If not called live by another party, Defendants expect to call Mr. Kearns as a witness in this case by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Jelenko Krsmanovic
Flowserve Canada Corp.
15 Worthington Drive,
Brantford, Ontario, Canada, N3T 5M5
Tel: 519-750-1906

Defendants expect to call Mr. Krsmanovic as a witness in this case. Mr. Krsmanovic can be contacted through counsel for Defendants. Mr. Krsmanovic may be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Thomas Micklas
16343 Azimuth Drive
Crosby, Texas 77532-5024
Tel: 713-472-7722

Defendants expect to call Mr. Micklas as a witness in this case. Mr. Micklas is not under the control of Defendants. Mr. Micklas may be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Harry Murdock
906 Main Street
Port Neches, Texas 77651
Tel: 409-727-2009

In the event that Mr. Murdock is called live by another party, Defendants will cross examine Mr. Murdock at trial. Mr. Murdock is not under the control of Defendants. If not called live by another party, Defendants expect to call Mr. Evans as a witness in this case by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Lev Nelik, Ph.D., P.E., APICS
Pumping Machinery, LLC
2241 Dartford Drive
Atlanta, Georgia 30338
Tel: 770-310-0866

Defendants expect to call Dr. Nelik as a witness in this case. Dr. Nelik can be contacted through counsel for Defendants. Dr. Nelik will be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Christian Olavesen
14607 Coolridge Court
Houston, Texas 77062-203
Tel: 281-532-2080

Defendants expect to call Mr. Olavesen as a witness in this case. Mr. Olavesen is not under the control of the Defendants. Mr. Olavesen may be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Gary Osorno
2740 Indiana Avenue
Kenner, Louisiana
Tel: 504-469-0500

In the event that Mr. Osorno is called live by another party, Defendants will cross examine Mr. Osorno at trial. Mr. Osorno is not under the control of Defendants. If not called live by another party, Defendants expect to call Mr. Osorno as a witness in this case by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Gregg S. Perkin, P.E.
Engineering Partners International
1310 Kingwood Drive
Kingwood, Texas 77339
Tel: 832-644-4410

In the event that Mr. Perkin is called live by another party, Defendants will cross examine Mr. Perkin at trial. Mr. Perkin is not under the control of Defendants. If not called live by another party, Defendants expect to call Mr. Perkin as a witness in this case by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Mike Pilgrim
24 Fisher Road
Port Lavaca, Texas 77979
Tel: 361-552-1533

In the event that Mr. Pilgrim is called live by another party, Defendants will cross examine Mr. Pilgrim at trial. Mr. Pilgrim is not under the control of Defendants. If not called live by another party, Defendants expect to call Mr. Pilgrim as a witness in this case by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Robert Roberts
612 Northwood Trail
Southlake, Texas 76092
Tel: 817-690-6607

If the need arises, Defendants may call Mr. Roberts as a witness in this case. Mr. Roberts can be contacted through counsel for Defendants. Mr. Roberts will be called live.

Stewart Shoefstall
Flowserve Corporation
2220 FM 365
Port Arthur, Texas 77640
Tel: 409-727-1476

Defendants expect to call Mr. Shoefstall as a witness in this case. Mr. Shoefstall can be contacted through counsel for Defendants. Mr. Shoefstall will be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Brad Taylor
5040 Kings Court
Bridge City, Texas 77630
Tel: 409-727-2009

In the event that Mr. Taylor is called live by another party, Defendants will cross examine Mr. Taylor at trial. Mr. Taylor is not under the control of Defendants. If not called live by another party, Defendants may call Mr. Taylor as a witness, if the need arises, in this case by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

George Vucak
Flowserve Canada Corp.
15 Worthington Drive,
Brantford, Ontario, Canada, N3T 5M5
Tel: 519-750-1906

Defendants expect to call Mr. Vucak as a witness in this case. Mr. Vucak can be contacted through counsel for Defendants. Mr. Vucak may be called live or by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Mike Wike
2740 Indiana Avenue
Kenner, Louisiana
Tel: 504-469-0500

In the event that Mr. Wike is called live by another party, Defendants will cross examine Mr. Wike at trial. Mr. Wike is not under the control of Defendants. If not called live by another party, Defendants may call Mr. Wike as a witness in this case by a videotaped deposition that was stenographically recorded. The deposition and video are available for review at the office of counsel for Defendants.

Exhibit List

Defendants provide an Exhibit List, attached hereto as Exhibit “A,” identifying the documents and other exhibits that Defendants expect to offer or may offer if the need arises. Not all exhibits listed are intended to be offered by Defendants and the designation of any document on the list should not be considered or construed as an indication on the part of Defendants that the document is automatically considered admissible by Defendants. Defendants reserve the right to designate further exhibits, as the need may arise, as provided for under the current scheduling order.

Respectfully submitted,

/s/ Raymond A. Neuer

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Federal Bar No. 11085
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909 Fannin Street
Houston, Texas 77010-1003
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***Attorney-in-Charge for Defendants
Flowserve US Inc. and Flowserve Corporation***

Of Counsel:

SHEEHY WARE & PAPPAS, PC
2500 Two Houston Center
909 Fannin Street
Houston, Texas 77010-1003
713.951.1000 – telephone
713.951.1199 – facsimile

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record pursuant to the Texas Rules of Civil Procedure on the _____ day of December, 2016.

/s/ Raymond A. Neuer

Raymond A. Neuer

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